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18 UNITED STATES DISTRICT COURT

19 DISTRICT OF NEVADA

20 Shoman Za Washington, Jr., individually) Case No. 2:22-cv-01400-APG-VCF
21 and on behalf of all others similarly)
22 situated,) Joint Stipulation and Order for
23 Plaintiff,) Extension of Time to Respond to Class
24 vs.) Action Complaint
25 Phoenix Financial Services, LLC,)
Defendant.) ***First Request***
) Current Response Date: Dec. 7, 2022
) New Response Date: Dec. 21, 2022
)

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Joint Stipulation for Extension of Time

1 It is hereby stipulated by Plaintiff Shoman Za Washington, Jr. and Defendant
2 Phoenix Financial Services, LLC (“PFS”), through undersigned counsel, that PFS
3 may have an extension of time to respond to the Class Action Complaint from
4 December 7, 2022, through and until December 21, 2022. This stipulation is made
5 with respect to the following:

6 1. Plaintiff filed this action on August 29, 2022 in the United States
7 District Court for the District of Nevada.

8 2. PFS was served on November 16, 2022, making the original response
9 due date December 7, 2022.

10 3. Additional time is needed for defense counsel to evaluate the
11 information necessary to respond to the Complaint. The parties also intend to
12 discuss potential early resolution of this claim.

13 4. On December 6, 2022, the parties agreed to a 14-day extension of time
14 for PFS to respond to the Complaint through, and until December 21, 2022.

15 Granting this request for an extension of time to respond to the Complaint
16 will neither prejudice any party nor unreasonably delay the litigation.

17 IT IS SO STIPULATED.

18 Dated: 12/6/2022

19 CONTEMPORARY LEGAL SOLUTIONS

20 /s/Robert M. Tzall
21 Robert M. Tzall

22 Joint Stipulation for Extension of Time

Attorney for Plaintiff
Shoman Za Washington, Jr.

Dated: 12/6/2022

SESSIONS, ISRAEL & SHARTLE, LLP

/s/James K. Schultz

James K. Schultz

Attorney for Defendant

Phoenix Financial Services, LLC

Pursuant to the Parties' joint stipulation, IT IS HEREBY ORDERED:

Defendant shall have an extension of time to and including December 21, 2022, to respond to the Complaint.

Dated: 12-7-2022

United States Magistrate Judge